

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC. and  
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil Action No. 1:21-cv-11558-LTS

**AMERICAN AIRLINES GROUP INC. AND JETBLUE AIRWAYS CORPORATION'S  
MOTION TO COMPEL ATTENDANCE OF DELTA EXECUTIVES AT TRIAL**

Pursuant to Rule 45 of the Federal Rules of Civil Procedure and Paragraph 20 of the Supplemental Scheduling and Case Management Order (ECF No. 76), Defendants American Airlines Group Inc. (“American”) and JetBlue Airways Corporation (collectively with American, “Defendants”) respectfully move this Court to compel the attendance and testimony of Joseph Esposito and Glen Hauenstein, executives at Delta Air Lines, Inc., at the forthcoming trial, scheduled to begin on September 27, 2022, in accordance with the trial subpoenas that Defendants have served on those individuals today.

In support of this motion, Defendants submit an accompanying memorandum, an attorney declaration, and two exhibits. Defendants will further submit any additional briefing and argument permitted or requested by the Court.

Dated: September 13, 2022

Respectfully submitted,

/s/ Daniel M. Wall

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**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), Defendants hereby certify that they have conferred with counsel for Delta regarding the relief requested in this motion, and as described in the Declaration of Marguerite M. Sullivan, Delta's counsel informed Defendants that they would move to quash the subpoenas at issue. Defendants further certify that they have conferred with Plaintiffs regarding the relief requested in this motion, and Plaintiffs currently take no position on Defendants' motion, but reserve all rights to take a position or file any responsive materials after seeing Defendants' motion and related filings.

/s/ Daniel M. Wall  
Daniel M. Wall

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing. In addition, I hereby certify that a copy of the foregoing document was served by email upon Michael Mitchell of Boies Schiller Flexner LLP, counsel to Delta Air Lines, Inc.

/s/ Daniel M. Wall  
Daniel M. Wall